

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

GREETING CARD ASSOCIATION INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS CINTRON (I)

Pursuant to Order No. 5875 and 39 CFR sec. 3020.116, the Greeting Card Association (GCA) submits interrogatories and/or requests for documents, as follows:

Interrogatories to Postal Service witness Cintron – GCA/USPS-T-1/1 to 3

The term “documents” includes (without limitation) letters, memoranda, telegrams, reports, studies, articles from periodicals, speeches, testimonies, books and extracts from books, pamphlets, tabulations, and work papers. In terms of format, “documents” includes written or printed records and disks, tapes, portable drives, or other recorded media, together with such written or printed material as is necessary to understand and use such disks, tapes, drives or other recorded media.

Any part of these interrogatories may be re-directed to one or more other Postal Service witness(s), or answered institutionally, as necessary.

May 13, 2021

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T-1/1

1. Your prefiled testimony cites decline in First-Class Mail volume as a principal reason for the proposed changes in service standards.

(a) Does your testimony assume that each First-Class Mail product will, for the planning horizon you considered, remain of the same description as it is currently?

(b) Is it your understanding that the Postal Service's plan to change First-Class Mail service standards is based on the assumption that each First-Class Mail product will, for the planning horizon considered in formulating the plan, remain of the same description as it is currently?

GCA/USPS-T-1/2

2. Can you confirm that in developing the proposal to change First-Class Mail service standards, the Postal Service did not consider modifications to existing First-Class Mail products, or creation of new First-Class Mail products, the aim of which would be to retard or arrest the decline in First-Class volume?

If you do not confirm, please describe any such modifications or new products which were considered, and explain (i) whether they factored into the proposal to change service standards and (ii) if they factored into the proposal to change service standards, how they are reflected in the proposal.

GCA/USPS-T-1/3

3. At page 25 of USPS-T-5, Mr. Thress describes an observation that household mailers are more affected by delivery schedules than non-household mailers.

(a) In preparing your prefiled testimony, were you aware of this observation?

(b) If your answer to part (a) is affirmative, please (i) state whether your prefiled testimony makes use of this observation; and (ii) if it does, describe how the testimony makes use of it.